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Counsel for Plaintiffs

9

10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

11 HAKKASAN LV, LLC, a Nevada
12 limited liability company,
13 HAKKASAN LIMITED, a foreign
private limited company,

14 Plaintiffs,

15 v.

16 MARK DANIEL ADAMCZYK, an
individual; iDRIVE ORLANDO, LLC,
17 a foreign limited liability company,

18 Defendants.

19 Case No.:
20

21 **COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF**

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- (1) Cybersquatting under
15 U.S.C. § 1125(d)
- (2) Trademark Infringement and
Counterfeiting under
15 U.S.C. § 1114
- (3) Copyright Infringement
- (4) Unfair Competition under
15 U.S.C. § 1125(a)
- (5) Common Law Trademark
Infringement
- (6) Deceptive Trade Practices under
N.R.S. 598.0903, et seq.
- (7) Intentional Interference with
Prospective Economic Advantage

For their complaint against Defendants Mark Daniel Adamczyk and iDrive Orlando, LLC (“Defendants”), Plaintiffs, Hakkasan LV, LLC, a Nevada limited liability company and Hakkasan Limited, a foreign private limited company (“Plaintiffs”) complain and allege as follows:

NATURE OF ACTION

This is an action for cybersquatting, trademark infringement, counterfeiting, and unfair competition under federal statutes, with pendent claims for common law trademark infringement, state deceptive trade practices, and intentional interference with prospective economic advantage. Plaintiffs seek damages, attorneys' fees, costs, and preliminary and permanent injunctive relief.

JURISDICTION

1. This Court has subject matter jurisdiction over this case pursuant to 28 U.S.C. §§1331 and 1338(a). This Court has supplemental jurisdiction over Plaintiffs' state law claims pursuant to 28 U.S.C. § 1337(a).

2. This Court has personal jurisdiction over Defendants based upon the following: (a) Defendants operate a web site on the Internet that is accessible to residents of the State of Nevada; (b) Defendants' website provides information and services related to Hakkasan Nightclub in Las Vegas, Nevada and seeks personal information from users in order to facilitate the provision of such information and services in Las Vegas, Nevada; and (c) Defendants registered the domain names <www.hakkasanbottleservice.com> and <www.hakkasan.net> (the "Infringing Domain Names") incorporating the Plaintiffs' famous and federally registered HAKKASAN mark for nightclub services; (d) Defendants linked the Infringing Domain Names to a website depicting Plaintiffs' mark, logos, and copyrighted images, with the intent to pass their website off as an official Hakkasan website, or to show affiliation with Plaintiffs' nightclub and services; and (e) Defendants committed tortious acts that they knew or should have known would cause injury to Plaintiffs in the State of Nevada.

3. Venue is proper in the United States District Court for the District of Nevada under 28 U.S.C. § 1391(b) and (c). Venue lies in the unofficial Southern Division of this Court.

PARTIES

4. Plaintiff Hakkasan LV, LLC (“Hakkasan LV”), a Nevada limited liability company, is an indirect wholly owned subsidiary of Plaintiff Hakkasan Limited (“Hakkasan Parent”), a foreign private limited company that is qualified to do business in the state of Nevada. Hakkasan LV owns and operates Hakkasan, a premier nightclub and restaurant venue located inside the MGM Grand

Hotel and Casino on the Las Vegas strip (“Hakkasan Las Vegas”). Hakkasan Parent also owns and/or operates, either directly or through its subsidiary companies, several other Hakkasan restaurants around the globe, including Dubai, London, New York, San Francisco and Miami.

5. Upon information and belief, Defendant Mark Daniel Adamczyk is an individual and resident of the State of Florida and Defendant iDrive Orlando, LLC is a Florida limited liability company. See printout from Florida Secretary of State website, attached hereto as **Exhibit 1** and printouts of Whois Information for <hakkasanbottleservice.com> and <hakkasan.net> Internet Domain Names, attached hereto as **Exhibit 2**.

ALLEGATIONS COMMON TO ALL COUNTS

6. Hakkasan is a famous restaurant and nightlife venue with multiple locations around the world. Hakkasan Las Vegas encompasses approximately 80,000 square feet of restaurant, nightclub and lounge space. This venue features a modern Cantonese restaurant, headed up by a Michelin-starred chef, a 55,000 square foot nightclub featuring elaborate cocktail lounges and a garden pavilion with a two-story waterfall. In addition, Hakkasan LV has booked some of the most famous DJ's in the world to perform at Hakkasan Las Vegas, including Tiësto, Calvin Harris, and Steve Aoki.

7. Hakkasan Parent owns the mark HAKKASAN in connection with, among other things, restaurant, bar and nightclub services. In particular, Hakkasan Parent owns federal trademark registrations (U.S. Reg. Nos. 3,789,248 and 4,458,604) for HAKKASAN for, among other things, bar and restaurant services, nightclubs, and nightclub services, and pending trademark applications (U.S. Ser. Nos. 86/183953, 86/183947, and 86/183935) for entertainment services, retail store services, clothing, and related goods and services (the "HAKKASAN Marks"). Hakkasan LV is a licensee of the HAKKASAN Marks in connection with its ownership and operation of Hakkasan Las Vegas.

8. None of Hakkasan Parent's federal trademark registrations or pending trademark applications have been abandoned, canceled or revoked.

9. Since opening the original HAKKASAN in 2001 and its first US location in 2009, Hakkasan Parent and its predecessors-in-interest, have used the HAKKASAN Marks in connection

1 with advertising and promoting its restaurants in the United States and around the world. As a
 2 licensee of the HAKKASAN Marks, Hakkasan LV has used the HAKKASAN Marks to promote its
 3 Las Vegas restaurant and nightclub services in the United States and around the world since 2012.

4 10. The HAKKASAN name and mark is an internationally recognized and respected
 5 name in the restaurant and nightlife industry. Plaintiffs have spent millions of dollars to advertise
 6 and promote the HAKKASAN Marks in print, broadcast media and on the Internet through their
 7 website, accessible throughout the United States and around the world at <hakkasan.com> and
 8 <hakkasanlv.com>. True and correct copies of the home pages for Plaintiffs' web sites are attached
 9 hereto as **Exhibit 3** and are incorporated herein by this reference. In addition, Plaintiffs have made
 10 extensive use of the HAKKASAN Marks on, among other things, signage, billboards and
 11 promotional materials.

12 11. Based on its federal trademark registrations, pending federal trademark applications
 13 and extensive use, Hakkasan Parent owns the exclusive right to use its HAKKASAN Marks in
 14 connection with restaurant, bar, nightclub and related goods and services. As a licensee of the
 15 HAKKASAN Marks and pursuant to an agreement between the parties, Hakkasan LV is entitled to
 16 the exclusive right to use the HAKKASAN Marks in Las Vegas, Nevada in connection with
 17 Hakkasan Las Vegas for restaurant, bar and nightclub services and is entitled to enforce its rights
 18 against Defendant.

19 12. The uniqueness of Hakkasan Las Vegas, along with the extensive advertising and
 20 promotion of Hakkasan Las Vegas have resulted in the HAKKASAN name and mark being
 21 distinctive and famous for bar, restaurant and nightclub services.

22 13. Hakkasan Parent has filed applications for U.S. Copyright Registrations for materials
 23 they own and use on the <hakkasan.com> and <hakkasanlv.com> websites including photographs,
 24 other images, text and source code. The applications are:

- 25 i. Application No. 1-1103521554 for Photographs
- 26 ii. Application No. 1-1103400211 for Source Code
- 27 iii. Application No. 1-1103521942 for website text and graphics.

28 14. On or about January 27, 2013, Defendants registered the Internet domain name

1 <hakkasan.net> and on March 7, 2013, Defendants registered the Internet domain name
 2 <hakkasanbottleservice.com> (the “Infringing Domain Names”) with Godaddy.com, a registrar for
 3 domain names. The first Infringing Domain Name is comprised solely of Hakkasan Parent’s famous
 4 HAKKASAN trademark while the second Infringing Domain Name also contains the words “bottle
 5 service,” a form of high-end cocktail service offered at Plaintiffs’ Hakkasan Las Vegas nightclub
 6 that includes a VIP table reservation and host. In early to mid-2014, both websites were updated.
 7 See Exhibit 2.

8 15. Sometime after registration, presumably around the time the websites were updated in
 9 early to mid-2014, Defendants linked the Infringing Domain Names to a website that solicits users to
 10 submit their contact information to book bottle service and VIP table reservations at Hakkasan Las
 11 Vegas. Also included on the website are links that offer bottle service to several of Plaintiffs’
 12 competitors, including Light at Mandalay Bay and XS at Wynn. These links direct the user to
 13 another website owned by Defendants, <viptablereservations.com> to book VIP table reservations.
 14 See printouts from Defendants’ websites attached hereto as **Exhibit 4**.

15 16. The infringing website also features a “Contact/Reserve VIP” link that brings users to
 16 a page where they can submit their personal contact information to book a table reservation at
 17 Plaintiffs’ nightclub. See id.

18 17. The infringing website also contains two photographs of the inside of Plaintiffs’
 19 Hakkasan Las Vegas nightclub that belong to Plaintiffs. See printouts of the
 20 <hakkasanbottleservice.com> homepage utilizing Plaintiffs’ copyrighted images, attached hereto as
 21 **Exhibit 5.**

22 18. Defendants’ website contains the Plaintiffs’ federally registered HAKKASAN
 23 trademark and KK logo, together with copyrighted images stolen directly from the Plaintiffs’ own
 24 nightclub websites.

25 19. The manner in which Defendants portray their business on this website implies that
 26 they are authorized to offer services to the public on behalf of the Hakkasan Las Vegas, when they
 27 are not. See **Exhibits 4 and 5.**

28 20. Upon information and belief, Defendants have knowingly and willfully offered for

1 sale and sold counterfeit services, including access to the Hakkasan Las Vegas nightclub, VIP table
 2 reservations, and bottle service, in wrongful and unauthorized association with the HAKKASAN
 3 Marks on Defendants' infringing website at <hakkasan.net> and <hakkasanbottleservice.com>.

4 21. Defendants are not authorized promoters for Plaintiffs' nightclub, nor were they given
 5 permission to utilize Plaintiffs' HAKKASAN mark, logos and copyrighted materials on their
 6 website.

7 22. Plaintiffs became aware of the infringing nature of the Infringing Domain Names in
 8 or about September 2014.

9 23. On or about October 3, 2014, Plaintiffs sent Defendants a demand letter via certified
 10 mail and registered email requesting that Defendants immediately cease use of the Infringing
 11 Domain Names and transfer the Infringing Domain Names to Plaintiffs. See October 3, 2014
 12 Demand Letter from Lauri S. Thompson, Esq., attached hereto as **Exhibit 6**.

13 24. Defendant Adamczyk responded via email on October 3, 2014. While he denied that
 14 the Infringing Domain Names were registered in bad faith, Defendant Adamczyk offered to sell
 15 Plaintiffs the Infringing Domain Names and the existing website for \$4,788.00. See October 3, 2014
 16 Email Response received from Defendant Mark Adamczyk, attached hereto as **Exhibit 7**.

17 25. In an email dated October 6, 2014, Mr. Adamczyk further admitted that he set up the
 18 website to obtain customers looking for Hakkasan's services. He then sends those leads to
 19 commissioned VIP hosts. In addition, Mr. Adamczyk again offered to sell the Infringing Domain
 20 Names to Plaintiffs. See October 6, 2014 Email from Defendant Adamczyk, attached hereto as
 21 **Exhibit 8**.

22 26. By registering and/or using domain names containing the entirety of Plaintiffs'
 23 trademark, Defendants were and are attempting to trade on the goodwill of Plaintiffs.

24 27. By registering and/or using domain names containing the entirety of Plaintiffs'
 25 trademark, Defendants were and are attempting to divert Internet users looking for Plaintiffs'
 26 websites to their own website.

27 28. By registering and/or using domain names containing Plaintiffs' trademark(s),
 28 Defendants were and are attempting to create an association between the Infringing Domain Names

1 and Defendants' promotion services and the Plaintiffs' famous trademarks.

2 29. Plaintiffs' marks at issue in this case were distinctive at the time Defendants
3 registered the Infringing Domain Names.

4 30. Defendants registered the Infringing Domain Names and then linked them to their
5 infringing website using Plaintiffs' HAKKASAN name and marks, together with content copied
6 from Plaintiffs' website, with the bad faith intent to profit from Plaintiffs' famous marks and world-
7 renowned reputation.

8 31. Upon information and belief, the Defendants have no trademark or other intellectual
9 property rights in the HAKKASAN name or mark.

10 32. Upon information and belief, the Defendants have no prior use of the Infringing
11 Domain Names in connection with the bona fide offering of any goods or services.

12 33. Upon information and belief, the Defendants intended to divert customers from the
13 Plaintiffs' web sites to the Infringing Domain Names in a manner that could harm the goodwill
14 represented by Plaintiffs' marks.

15 34. Upon information and belief, Defendants intended to divert customers from
16 purchasing legitimate tickets, VIP table reservations and bottle service from the Plaintiffs, to instead
17 purchase Defendants' counterfeit services so they could commercially benefit from the sale.

18 35. Plaintiffs' HAKKASAN mark incorporated in Defendants' Infringing Domain Names
19 is distinctive and famous. Upon information and belief, the Defendants did not believe or have
20 reasonable grounds to believe that the use of the Infringing Domain Names was a fair use or
21 otherwise lawful.

22 36. Plaintiff, Hakkasan Parent owns the exclusive rights in its copyrighted works as
23 articulated under 17 U.S.C. § 106. Plaintiff has not assigned any of those rights to the Defendants.
24 Defendants' use of Plaintiff's copyrighted materials on Defendants' website constitutes copyright
25 infringement under 17 U.S.C. § 501.

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FIRST CLAIM FOR RELIEF

(Cybersquatting under the
Lanham Act, 15 U.S.C. § 1125(d))

37. Plaintiffs incorporate the allegations in the preceding paragraphs as if fully set forth herein.

38. Defendants registered, trafficked in, and/or used domain names that are identical or confusingly similar to and/or dilutive of Plaintiffs' trademarks, which were distinctive and/or famous at the time of registration of the Infringing Domain Names.

39. Defendants have or had a bad-faith intent to profit from Plaintiffs' trademarks.

40. As a direct and proximate result of such conduct, Plaintiffs have suffered, and will continue to suffer, monetary loss and irreparable injury to their business, reputation, and goodwill.

SECOND CLAIM FOR RELIEF

(Trademark Infringement and Counterfeiting
Under the Lanham Act, 15 U.S.C. § 1114)

41. Plaintiffs incorporate the allegations in the preceding paragraphs as if fully set forth herein.

42. Defendants used and/or are using in commerce the Plaintiffs' HAKKASAN Marks to provide their counterfeit services to the public. Defendants' use is unauthorized and creates confusion in the marketplace.

43. Defendants' use in commerce of Plaintiffs' identical marks and/or a mark confusingly similar to Plaintiffs' trademarks for Defendants' services, and associated website as described above, constitutes a reproduction, copying, counterfeiting, and colorable imitation of Plaintiffs' trademarks in a manner that is likely to cause confusion or mistake or is likely to deceive consumers.

44. By using Plaintiffs' marks and/or marks confusingly similar to Plaintiffs' trademarks with the knowledge that Plaintiffs own and have used, and continue to use, their trademarks in Las Vegas, across the United States, and around the world, Defendants have intended to cause confusion, cause mistake, or deceive consumers.

45. Upon information and belief, Defendants have knowingly and willfully advertised

and offered their counterfeit services for sale using the HAKKASAN Marks, with the intention of misleading, deceiving or confusing consumers as to the origin of their services and of trading on Plaintiffs' reputation and good will.

46. Defendants' use of Plaintiffs' marks and/or marks confusingly similar to Plaintiffs' trademarks has created a likelihood of confusion among consumers who may falsely believe that Defendants' business or web site is associated with Plaintiffs' Las Vegas restaurant and nightclub or that Plaintiffs sponsor or approve of Defendants' services or commercial activities.

47. Defendants' unauthorized use of the HAKKASAN Marks in interstate commerce as described above constitutes trademark counterfeiting under 15 U.S.C. § 1114(1).

48. Defendants' unauthorized use of the HAKKASAN Marks in interstate commerce as described above constitutes trademark infringement under 15 U.S.C. § 1114(1).

49. As a direct and proximate result of Defendants' infringement, Plaintiffs have suffered, and will continue to suffer, monetary loss and irreparable injury to their business, reputation, and goodwill.

50. Defendants' acts of counterfeiting and infringement will cause further irreparable injury to Plaintiffs if Defendants are not restrained by this Court from further violation of Plaintiffs' rights. Plaintiffs have no adequate remedy at law.

THIRD CLAIM FOR RELIEF
(Copyright Infringement Under 17 U.S.C. § 501)

51. Plaintiffs incorporate the allegations in the preceding paragraphs as if fully set forth herein.

52. Hakkasan Parent owns the copyright in certain photographs, source code and website images and text used on its websites.

53. Hakkasan Parent has filed federal copyright applications for photographs, source code, and website images and text used on its websites.

54. Without authorization from Plaintiff, and without any rights in the materials, Defendants' copied and transferred Plaintiff's copyrighted materials to their own website at <www.hakkasanbottleservice.com>.

55. Defendants' copying constitutes copyright infringement and such infringement has caused harm, and continues to cause harm to the Plaintiff.

FOURTH CLAIM FOR RELIEF
(Unfair Competition under the
Lanham Act, 15 U.S.C. § 1125(a))

56. Plaintiffs incorporate the allegations in the preceding paragraphs as if fully set forth herein.

57. Defendants' use in commerce of marks identical and/or confusingly similar to Plaintiffs' trademarks in connection with Defendants' services, web site, and Internet domain names, constitutes a false designation of origin and/or a false or misleading description or representation of fact, which is likely to cause confusion, cause mistake, or deceive as to affiliation, connection, or association with Plaintiffs, or as to the origin, sponsorship, or approval of Defendants' services or commercial activities.

58. Defendants' use in commerce of Plaintiffs' marks and/or marks confusingly similar to Plaintiffs' trademarks with the knowledge that Plaintiffs own and have used, and continue to use, their trademarks constitutes intentional conduct by Defendants to make false designations of origin and false descriptions about Defendants' services and commercial activities.

59. As a direct and proximate result of such unfair competition, Plaintiffs have suffered, and will continue to suffer, monetary loss and irreparable injury to their business, reputation, and goodwill.

FIFTH CLAIM FOR RELIEF

(Common Law Trademark Infringement)

60. Plaintiffs incorporate the allegations in the preceding paragraphs as if fully set forth herein.

61. By virtue of having used and continuing to use their trademarks, Plaintiffs have acquired common law rights in those marks.

62. Defendants' use of marks identical and/or confusingly similar to Plaintiffs' trademarks infringes Plaintiffs' common law rights in their trademarks, and this use is likely to cause confusion, mistake, or deception among consumers, who will believe that Defendants' services, web

site and/or Internet domain names originate from, or are affiliated with, or endorsed by Plaintiffs when, in fact, they are not.

63. As a direct and proximate result of Defendants' infringement of Plaintiffs' common law trademark rights under Nevada and other common law, Plaintiffs have suffered, and will continue to suffer, monetary damages and irreparable injury to its business, reputation, and goodwill.

SIXTH CLAIM FOR RELIEF

**(Deceptive Trade Practices
Under N.R.S. § 598.0915)**

64. Plaintiffs incorporate the allegations in the preceding paragraphs as if fully set forth herein.

65. Upon information and belief, in the course of conducting their business, Defendants knowingly made false representations as to affiliation, connection and/or association with Plaintiffs by using a mark confusingly similar to Plaintiffs' trademarks and otherwise engaging in deceptive trade practices.

66. As the direct and proximate result of Defendants' conduct, Plaintiffs have suffered, and will continue to suffer, monetary damages and irreparable injury to their business, reputation, and goodwill.

SEVENTH CLAIM FOR RELIEF

(Intentional Interference with Prospective Economic Advantage)

67. Plaintiffs incorporate the allegations in the preceding paragraphs as if fully set forth herein.

68. Upon information and belief, at the time Defendants adopted and began using Plaintiffs' names and marks and since that time, Defendants knew and have known that Plaintiffs are in the business of providing restaurant and bar services and more recently, nightclub services.

69. Upon information and belief, Defendants committed acts intended or designed to disrupt Plaintiffs' prospective economic advantage arising from advertising and/or providing these services.

70. Defendants' actions have disrupted or are intended to disrupt Plaintiffs' business by,

among other things, diverting web users away from Plaintiffs' web sites.

71. Defendants have no legal right, privilege or justification for its conduct.

72. As a direct and proximate result of Defendants' intentional interference with Plaintiffs' prospective economic advantage, Plaintiffs have suffered, and will continue to suffer, monetary damages and irreparable injury.

73. Based on the intentional, willful and malicious nature of Defendants' actions, Plaintiffs are entitled to recover exemplary damages and reasonable attorneys' fees and costs incurred in connection with this action.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully pray that the Court grant the following relief:

A. A preliminary and permanent injunction prohibiting Defendants, their respective officers, agents, servants, employees and/or all persons acting in concert or participation with them, or any of them, from: (1) using Plaintiffs' trademarks or confusingly similar variations thereof, alone or in combination with any other letters, words, letter strings, phrases or designs, in commerce or in connection with any business or for any other purpose (including, but not limited to, on web sites and in domain names); and (2) registering, owning, leasing, selling, or trafficking in any domain names containing Plaintiffs' trademarks or confusingly similar variations thereof, alone or in combination with any other letters, words, phrases or designs;

B. A preliminary and permanent injunction requiring the current domain name registrar to transfer the Infringing Domain Names to Plaintiffs;

C. A preliminary and permanent injunction requiring the Defendants to remove any and all content from the <www.hakkasanbottleservice.com> and any similar website they own and/or operate, which was obtained from the Plaintiffs' website or other source owned and operated by Plaintiffs, and which contains any name, mark, image, video, language, owned by the Plaintiffs or which references the Plaintiffs and any and all services they provide at the Hakkasan Las Vegas nightclub and elsewhere;

D. An award of compensatory, consequential, statutory, and punitive damages to Plaintiffs in an amount to be determined at trial;

E. An award of interest, costs and attorneys' fees incurred by Plaintiffs in prosecuting this action; and

F. All other relief to which Plaintiffs are entitled.

DATED: this 16th day of October, 2014.

GREENBERG TRAURIG, LLP

/s/ Lauri S. Thompson

Lauri S. Thompson (Bar No. 6864)
Laraine M. I. Burrell (Bar No. 8771)
Shauna L. Norton (Bar No. 11320)
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, Nevada 89169
Counsel for Plaintiffs

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3773 Howard Hughes Parkway, Suite 400 North
Las Vegas, Nevada 89169
Telephone: (702) 792-3773
Facsimile: (702) 792-9002

Exhibit 1

**Electronic Articles of Organization
For
Florida Limited Liability Company**

L13000165618
FILED 8:00 AM
November 19, 2013
Sec. Of State
nculligan

Article I

The name of the Limited Liability Company is:

IDRIVE ORLANDO, LLC

Article II

The street address of the principal office of the Limited Liability Company is:

1714 CONWAY ISLE CIRCLE
BELLE ISLE, FL. 32809

The mailing address of the Limited Liability Company is:

1714 CONWAY ISLE CIRCLE
BELLE ISLE, FL. 32809

Article III

The purpose for which this Limited Liability Company is organized is:

ANY AND ALL LAWFUL BUSINESS.

Article IV

The name and Florida street address of the registered agent is:

JAMES R INGERSOLL
4037 CONWAY PLACE CIRCLE
ORLANDO, FL. 32812

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

Registered Agent Signature: JAMES R INGERSOLL

Article V

The name and address of managing members/managers are:

Title: MGRM
KEITH R INGERSOLL
1714 CONWAY ISLE CIRCLE
BELLE ISLE, FL. 32809

L13000165618
FILED 8:00 AM
November 19, 2013
Sec. Of State
nculligan

Title: MGRM
ALEXANDRA KROT
680 OSCEOLA
WINTER PARK, FL. 32789

Title: MGRM
MARK ADAMCZYK
680 OSCEOLA AVE
WINTER PARK, FL. 32789

Article VI

The effective date for this Limited Liability Company shall be:

11/19/2013

Signature of member or an authorized representative of a member

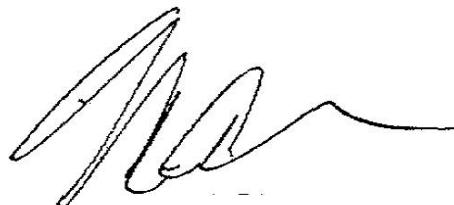
Electronic Signature: KEITH INGERSOLL

I am the member or authorized representative submitting these Articles of Organization and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of the LLC and every year thereafter to maintain "active" status.

LIB3000165618

To Whom it may concern

I, Mark D. Adamczyk, am the registered agent, officer and incorporator of I DRIVE ORLANDO INC. This corporation was administratively dissolved. This corporation is no longer conducting business. I am allowing the name to be used for an LLC. The name of the LLC is I DRIVE ORLANDO LLC.



11/20/13

Mark D. Adamczyk

900254034959

Exhibit 2

 Whois Lookup[Domains](#) [Web Hosting](#) [Servers](#) [Email](#) [Security](#) [Website Builder](#)[WHOIS](#)[Support](#)

hakkasanbottleservice.com registry whois

Updated 1 second ago - Refresh

Hot Deals!**.BIZ @ \$4.88 \$10.88**

Domain Name: HAKKASANBOTTLESERVICE.COM
Registrar: GODADDY.COM, LLC
Whois Server: whois.godaddy.com
Referral URL: http://registrar.godaddy.com
Name Server: NS09.DOMAINCONTROL.COM
Name Server: NS10.DOMAINCONTROL.COM
Status: clientDeleteProhibited
Status: clientRenewProhibited
Status: clientTransferProhibited
Status: clientUpdateProhibited
Updated Date: 03-may-2014
Creation Date: 07-mar-2013
Expiration Date: 07-mar-2015

hakkasanbottleservice.com registrar whois

Updated 1 second ago

Domain Name: HAKKASANBOTTLESERVICE.COM
Registry Domain ID: 1784768405_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: http://www.godaddy.com
Update Date: 2014-03-19 12:10:58
Creation Date: 2013-03-07 00:59:38
Registrar Registration Expiration Date: 2015-03-07 00:59:38
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.480-624-2505
Domain Status: clientTransferProhibited
Domain Status: clientUpdateProhibited
Domain Status: clientRenewProhibited
Domain Status: clientDeleteProhibited
Registry Registrant ID:
Registrant Name: Mark Daniel Adamczyk
Registrant Organization: iDriveOrlando LLC
Registrant Street: po box 618690
Registrant City: orlando
Registrant State/Province: Florida
Registrant Postal Code: 32779
Registrant Country: United States
Registrant Phone: 4077778777
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: info@mydomainholdings.com
Registry Admin ID:
Admin Name: Mark Daniel Adamczyk
Admin Organization: iDriveOrlando LLC
Admin Street: po box 618690
Admin City: orlando
Admin State/Province: Florida
Admin Postal Code: 32779
Admin Country: United States
Admin Phone: 4077778777
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: info@mydomainholdings.com
Registry Tech ID:
Tech Name: Mark Daniel Adamczyk
Tech Organization: iDriveOrlando LLC
Tech Street: po box 618690
Tech City: orlando
Tech State/Province: Florida
Tech Postal Code: 32779
Tech Country: United States
Tech Phone: 4077778777
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: info@mydomainholdings.com
Name Server: NS09.DOMAINCONTROL.COM
Name Server: NS10.DOMAINCONTROL.COM
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
Last update of WHOIS database: 2014-10-09T22:00:00Z

Web Hosting

Easy. Reliable. Affordable.

- Unlimited Disk Space
- Unlimited Data Transfer
- Unlimited Databases
- Unlimited Email Accounts
- 30 Day Money Back Guarantee

[View Plans](#)

The data contained in GoDaddy.com, LLC's Whois database, while believed by the company to be reliable, is provided "as is" with no guarantee or warranties regarding its accuracy. This information is provided for the sole purpose of assisting you in obtaining information about domain name registration records. Any use of this data for any other purpose is expressly forbidden without the prior written permission of GoDaddy.com, LLC. By submitting an inquiry, you agree to these terms of usage and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise make possible, dissemination or collection of this data, in part or in its entirety, for any purpose, such as the transmission of unsolicited advertising and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes.

Please note: the registrant of the domain name is specified in the "registrant" section. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

related domain names

[godaddy.com](#) [domaincontrol.com](#) [mydomainholdings.com](#) [internic.net](#)

Domains	Hosting & Products	Infrastructure	Support	
Register Domain Name	Linux Hosting	Datacenter Details	View Knowledge Base	Follow us on Twitter for Exclusive Offers!
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hakkasan.net registry whois

Updated 1 second ago - Refresh

Hot Deals!

Domain Name: HAKKASAN.NET
Registrar: GODADDY.COM, LLC
Whois Server: whois.godaddy.com
Referral URL: http://registrar.godaddy.com
Name Server: NS71.DOMAINCONTROL.COM
Name Server: NS72.DOMAINCONTROL.COM
Status: clientDeleteProhibited
Status: clientRenewProhibited
Status: clientTransferProhibited
Status: clientUpdateProhibited
Updated Date: 12-feb-2014
Creation Date: 27-jan-2013
Expiration Date: 27-jan-2015

**.BID @ \$20.88 \$30.88**

hakkasan.net registrar whois

Updated 1 second ago

Domain Name: HAKKASAN.NET
Registry Domain ID: 1776518678_DOMAIN_NET-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: http://www.godaddy.com
Update Date: 2014-02-12 05:13:19
Creation Date: 2013-01-27 05:01:09
Registrar Registration Expiration Date: 2015-01-27 05:01:09
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.480-624-2505
Domain Status: clientTransferProhibited
Domain Status: clientUpdateProhibited
Domain Status: clientRenewProhibited
Domain Status: clientDeleteProhibited
Registry Registrant ID:
Registrant Name: Mark Daniel Adamczyk
Registrant Organization: IDriveOrlando LLC
Registrant Street: PO Box 618690
Registrant City: Orlando
Registrant State/Province: Florida
Registrant Postal Code: 32861
Registrant Country: United States
Registrant Phone: +1.4077778777
Registrant Phone Ext:
Registrant Fax: +1.4072057087
Registrant Fax Ext:
Registrant Email: info@mydomainholdings.com
Registry Admin ID:
Admin Name: Mark Daniel Adamczyk
Admin Organization: IDriveOrlando LLC
Admin Street: PO Box 618690
Admin City: Orlando
Admin State/Province: Florida
Admin Postal Code: 32861
Admin Country: United States
Admin Phone: +1.4077778777
Admin Phone Ext:
Admin Fax: +1.4072057087
Admin Fax Ext:
Admin Email: info@mydomainholdings.com
Registry Tech ID:
Tech Name: Mark Daniel Adamczyk
Tech Organization: IDriveOrlando LLC
Tech Street: PO Box 618690
Tech City: Orlando
Tech State/Province: Florida
Tech Postal Code: 32861
Tech Country: United States
Tech Phone: +1.4077778777
Tech Phone Ext:
Tech Fax: +1.4072057087
Tech Fax Ext:
Tech Email: info@mydomainholdings.com
Name Server: NS71.DOMAINCONTROL.COM
Name Server: NS72.DOMAINCONTROL.COM
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
Last update of WHOIS database: 2014-10-09T22:00:00Z

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Exhibit 3



A promotional image for Fergie DJ at Hakkasan. It features a large, stylized gold 'FERGIE' text with 'DJ' written vertically next to it. Below the name is the text 'Friday October 17'. At the bottom, there are links for 'Tickets' and 'Reservations'. To the right of the text is a portrait of a man with short brown hair and a beard, wearing a black leather jacket over a dark t-shirt. He is looking slightly to his left with a neutral expression.

• [Corporate Events](#)
Upcoming Events



VICE

Thursday October 16 [Tickets](#)[Reservations](#)



Fergie DJ with Mark Eteson and Jeff Retro

Friday October 17 [Tickets](#)[Reservations](#)



Tiesto with Tchami

Saturday October 18 [Tickets](#)[Reservations](#)



Tiesto

Sunday October 19 [TicketsReservations](#)

Blogs and Media



Forbidden City: Rise of the Empress – Part Five Featuring Steve Aoki

Oct 01, 2014 in [Blog](#), [Featured](#) [Steve Aoki](#)

The fifth and final chapter in the fabled Forbidden City: Rise of the Empress saga inexorably turns traditional Chinese folklore [...read more](#)



Relive Tiësto's "Gold Party" at Hakkasan Nightclub

Oct 01, 2014 in [Blog](#), [Featured](#)

Even if you weren't in Las Vegas to experience "The Gold Party" at Hakkasan Nightclub first-hand, you can relive it in [...read more](#)

Galleries



Michael Woods at Hakkasan October 9

October 10, 2014



Danny Avila at Hakkasan October 2

October 6, 2014



Steve Aoki at Hakkasan October 3

October 6, 2014



Sunnery James and Ryan Marciano at Hakkasan September 28

October 1, 2014

Contact

Nightclub 702.891.3838
Restaurant 702.891.7888

General inquiries email:
info@angelmg.com

Press inquiries email:
PR@hakkasan.com

Location

MGM Grand Hotel & Casino
3799 Las Vegas Boulevard South
Las Vegas, Nevada 89109

Hours of Operation

Thursday, Friday, Sunday:
10:00pm – close
Saturday: 9:00pm – close

Additional Links

- [FAQ](#)
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Lets Get Social



^



[ENTER HAKKASAN](#)

[MAKE A RESERVATION](#)



Elegance, energy, invention 优雅, 能源, 发明



Wok hei, or the 'breath of the wok'

Wok hei translated into English means 'wok thermal radiation'...



Golden Week
黃金周
Golden Week in

China happens biannually, once in January or February...

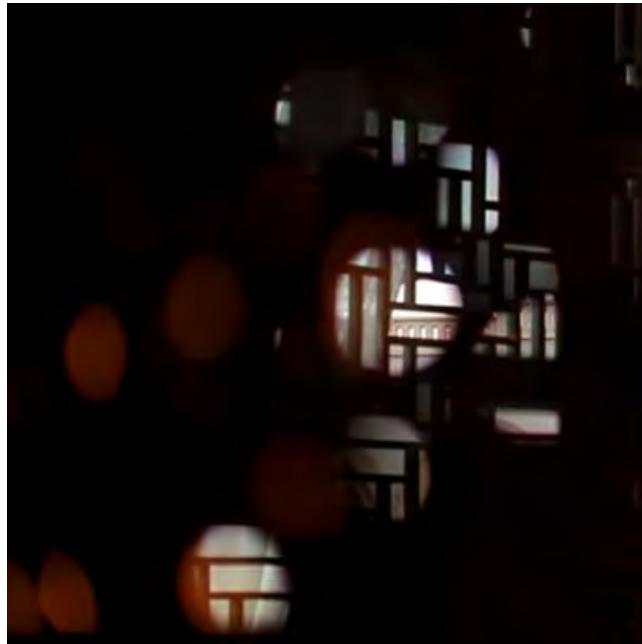


Dim Sum. Mix.
Life is a series of beautiful combinations.
Hakkasan Beverly...



With international outposts in **Miami, Abu Dhabi, Mumbai and New York**, Hakkasan promises one of the most vibrant and memorable experiences.

[FIND LOCATIONS](#)



Hakkasan's fine-dining Cantonese cuisine has placed the group at the forefront of modern Chinese restaurants

It includes signature dishes such as Peking duck with caviar and grilled Wagyu beef with king soy sauce, which can be found in Hakkasan restaurants worldwide. Extensive dim sum and dessert menus are also available to enjoy alongside Hakkasan's



award-winning wine list and signature cocktails.

[VIEW THE MENU](#)

An error occurred, please try again.

Hakkasan

HAKKASAN GROUP

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Email Address *

Exhibit 4

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 **HAKKASAN LAS VEGAS**

PAGE VIEWS: 174713

 <p>Address: 3799 S Las Vegas Blvd City, State : Las Vegas, NV Postal Code: 89109</p>	<p>Phone: (702) 891-3838 Url: http://hakkasanlv.com</p> <p>Inside Info: Status: Closed Door Policy:</p> <p>Type: Music: Dance , Dance/Electronic , Electro , Electronica</p>
--	--

Hakkasan Las Vegas at MGM Grand Hotel & Casino is the bold evolution of the prestigious global restaurant brand into an all-encompassing nightlife experience. This unique convergence of dramatic design, modern Cantonese cuisine, world-class mixology and exclusive musical talent collaborations across numerous genres creates a nightclub and restaurant concept historic in scale and ambition.

The brand's culinary program – helmed by Michelin-starred Chef Ho Chee Boon – takes a modern approach to authentic Cantonese cuisine, using the finest ingredients and inspired techniques to create timeless, signature dishes that marry fine dining and innovation.

Hakkasan Las Vegas' nightclub will feature creative partnerships with the top musical talents across various categories. Artists will work closely with the Hakkasan and AMG teams to tailor their performances to suit the unique capabilities of the venue and their own versatile styles.

Hakkasan enlisted several leading international design firms to create an immersive five-level space that offers a variety of experiences and atmospheres. Its progressive design is the next iteration of the brand's distinctive aesthetic: a contemporary interpretation of classic Chinoiserie, re-imagined for Las Vegas.

The result of a close collaboration between Hakkasan and leading entertainment and nightlife impresarios Angel Management Group, Hakkasan Las Vegas represents a visionary and widely anticipated endeavor.

COMING EVENTS

 MICHAEL WOODS Thursday, Oct 9, 2014 Michael Woods at Hakkasan Las Vegas <input type="button" value="BUY NOW"/>	 Tiesto Friday, Oct 10, 2014 Tiesto with Audien at Hakkasan Las Vegas <input type="button" value="BUY NOW"/>	 CALVIN HARRIS Saturday, Oct 11, 2014 Calvin Harris with Burns at Hakkasan Las Vegas <input type="button" value="BUY NOW"/>	 SUNNERY JAMES & RYAN MARCIANO Sunday, Oct 12, 2014 Sunnery James & Ryan Marciano at Hakkasan Las Vegas <input type="button" value="BUY NOW"/>
--	---	--	--

FEATURED ARTISTS

 AFROJACK <input type="button" value="MORE"/>	 AUDIEN <input type="button" value="MORE"/>
 BINGO PLAYERS <input type="button" value="MORE"/>	 BOTNEK <input type="button" value="MORE"/>
 BURNS <input type="button" value="MORE"/>	 CALVIN HARRIS <input type="button" value="MORE"/>
 DANNY AVILA <input type="button" value="MORE"/>	 DJ FERGIE <input type="button" value="MORE"/>

MAP

[Get directions](#)

HAKKASAN LAS VEGAS
3799 S Las Vegas Blvd
Las Vegas NV 89109



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 **Hakkasan Las Vegas** @HakkasanLV 11m
#ICYMI @CalvinHarris Recruits @gwenstefani and @HAIMtheband For New Album - bit.ly/1xpqHou via @hollywood_com
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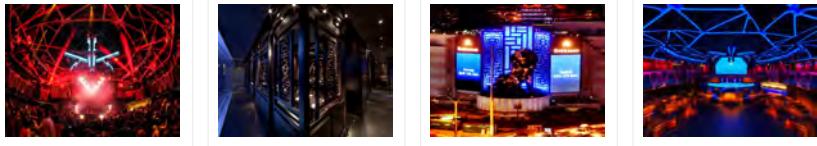
 **Hakkasan Las Vegas** @HakkasanLV 1h
. @tiesto offers latest 90's inspired mix on Club Life #391 bit.ly/1sfCazC via @dancingastro
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HAKKASAN LAS VEGAS FACEBOOK

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	D-WAYNE	MORE		EVA SHAW	MORE
	HARDWELL	MORE		MARTIN GARRIX	MORE
	MICHAEL WOODS	MORE		NERVO	MORE
	REV RUN	MORE		STEVE AOKI	MORE
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PHOTO GALLERY SPACE

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Main menu



Hakkasan Nightclub Bottle Service / VIP Table Reservations

Full Name *

Phone *

Email *

Date *

Month Day Year A small, light-gray square icon with a grid pattern, representing a calendar or date picker.

How Many Guys in Party? *

How Many Girls in Party? *

Budget *

- Select -

Other Options *

- Hotel
- Restaurant Reservations
- Pool Cabana / Party Reservations
- Another Night at Nightclub VIP Table (Please use notes to specify what club and night)
- Limo
- Luxury Car Rental
- Private Yacht Rental / Jet Ski (Miami)
- Race Cars (Las Vegas)
- Helicopter Tour
- Other (Use Notes)

If you are in town for a couple days and need other accommodations please let us know. We can help you with your entire trip. Please check all that apply that you might need.

Comments

Submit

CLIENT SAYS

"I texted my VIP host and he met me in front of club and walked me right to table. Had a great table and no problems. Can't wait to come back and will use VIP Table Reservations again!"



Rameet Nijhar

GENERAL ADMISSION CLUB TICKETS

Las Vegas General Admission Nightclub Tickets

Miami General Admission Nightclub Tickets



ABOUT US

VIP Table Reservations is your premier website for booking VIP Bottle Service at the top clubs in Las Vegas, Miami, Super Bowl, New York All Star Weekend, EDC Orlando, Orlando Bottle Service and other Special Events!

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No Table - No Fun - Book Bottle Service / VIP Table Reservations at Hakkasan
Nightclub.

[BOOK VIP TABLE NOW](#)

<http://viptablereservations.com/Las-Vegas/Hakkasan/bottle-service-reservations>



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[Click here to request more information on
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Get confirmation and information online about
your upcoming VIP Table Reservation For Hakkasan
Bottle Service (<http://viptablereservations.com/Las-Vegas/Hakkasan/bottle-service-reservations>).



Hakkasan at the MGM Grand

[Check out www.MGMGrand.com
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Hakkasan MUSIC

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Hakkasan Bottle Service & VIP Table Reservations.

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[XS Bottle Service \(<http://xsbottleservice.com>\)](#)

[Hakkasan Bottle Service \(<http://hakkasanbottleservice.com>\)](#)

[The Bank Bottle Service \(<http://thebankbottleservice.com>\)](#)

[Story Bottle Service \(<http://storybottleservice.com>\)](#)

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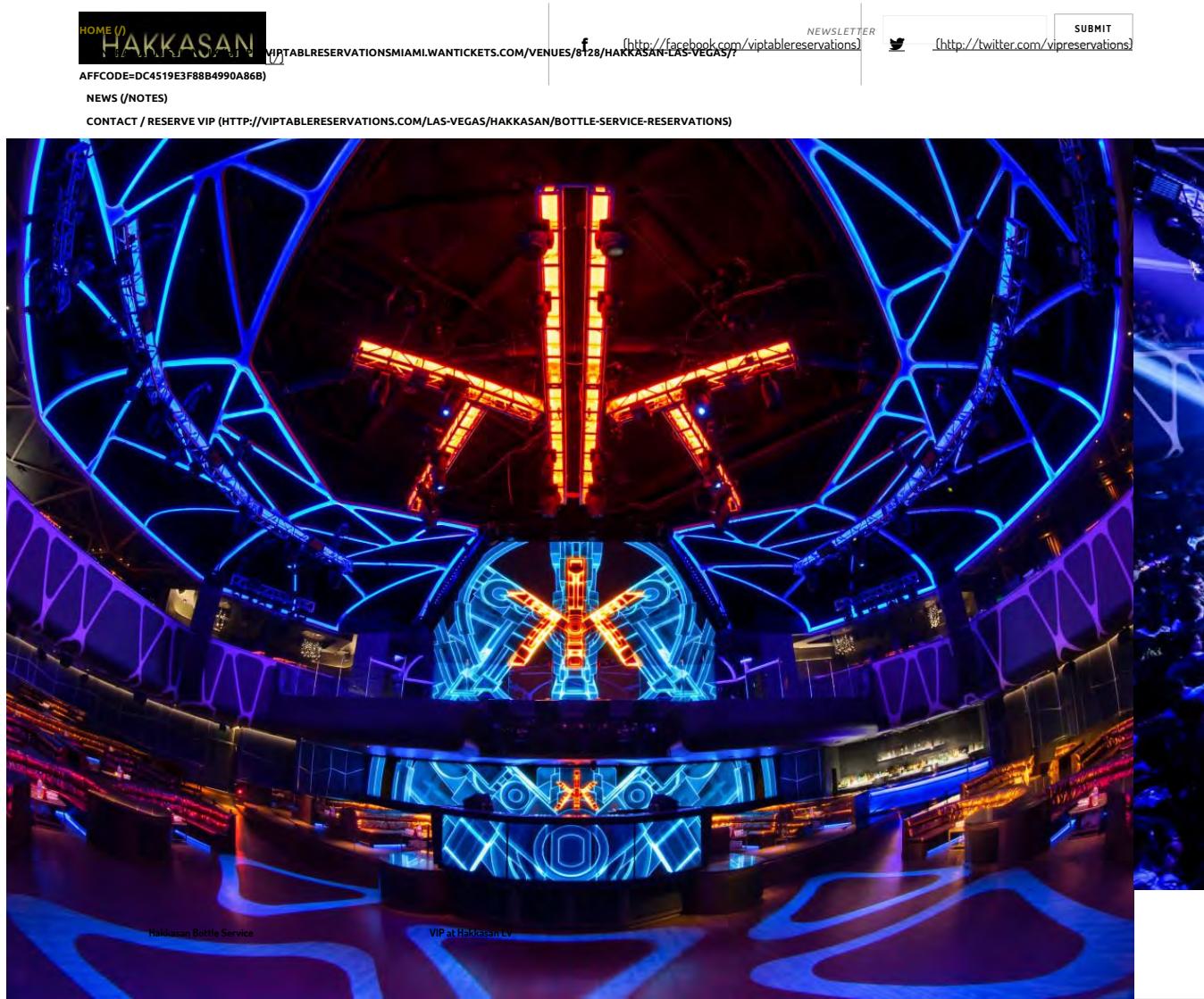
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Simply go to our VIP Bottle Service page for Hakkasan Bottle Service!

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[\(<http://hakkasanbottleservice.com>\)](#) is a website launched to cater to the VIP's only crowd visiting Las Vegas, NV. VIP Tables and Buying Bottles at Hakkasan Nightclub in Las Vegas!

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We can get you VIP table at Hakkasan Nightclub.

Simply go to our VIP Bottle Service page for Hakkasan Bottle Service!

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bottle-service-gears-labor-

day-weekend-2014)

LETTER

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</notes/hakkasan-bottle-service-gears-labor-day-weekend-2014>

Calvin Harris - Tiesto will be playing one night in Las Vegas and then off to Miami for one night there. Living the life for the DJ's who take home a couple hundred thousand for each performance. If you are looking to book a VIP Table at

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Photos from Hakkasan Las Vegas Calvin Harris VIP Bottle Service (/notes/photos-hakkasan-las-vegas-calvin-harris-vip-bottle-service)

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 Published: Jun 04  Posted Under: [hakkasan edc 2014 \(/tags/hakkasan-edc-2014\)](#), [bottle service \(/tags/bottle-service\)](#), [vip table reservations \(/tags/vip-table-reservations\)](#)

HOME (/)

Hakkasan EDC 2014 Line Up - LETTER

GENERAL ADMISSION TIX

(HTTP://VIPTABLESERVATIONSMIAMI.WANTICKET.COM/4-MENUES/8128/HAKKASAN-LAS-VEGAS/?AFFCODE=DC4519E3F88B4990A86B)

NEWS (/NOTES)

Reservations

CONTACT /RESERVE VIP (HTTP://VIPTABLESERVATIONS.COM/LAS-

VEGAS/HAKKASAN/BOTTLE-SERVICE-RESERVATIONS)

(/notes/hakkasan-edc-2014-

line-vip-tables-and-bottle-service-reservations)

(http://hakkasanbottleservice.com)

Read More (/notes/hakkasan-edc-2014-line-vip-tables-and-

bottle-service-reservations)



Published: Jun 04



Posted Under: [jesse marco](#) ([/tags/jesse-marco](#)), [hakkasan](#) ([/tags/hakkasan](#)), [las vegas](#) ([/tags/las-vegas](#)), [bottle service](#) ([/tags/bottle-service](#)), [vip](#) ([/tags/vip](#))

Hakkasan Sunday Night Party

(/notes/hakkasan-sunday-

night-party)

Jesse Marco
Hakkasan Main Room
VIPTABLERESERVATIONS.COM/LASVegas

NEWS (/NOTES)
Doors open at 10:30PM. All sales are final. No refund. No exchange. No cancellation possible.

Important Notice

In order to benefit from our flexible check-in and transfer policy, MALE and FEMALE tickets have to be purchased separately for the same per ticket service fee. Click the BUY MORE button underneath our Congratulations message once your transaction has been completed to instantly return to this ticket type selection for your additional purchase.

Book VIP or Get General Admission Tickets with above menu!

[Read More \(/notes/hakkasan-sunday-night-party\)](#)

Hakkasan Bottle Service
(<http://hakkasanbottleservice.com>)

Hakkasan Bottle Service & VIP Table Reservations.

Light bottle Service
(<http://lightbottleservice.com>)

XS Bottle Service
(<http://xsbottleservice.com>)

Hakkasan Bottle Service
(<http://hakkasanbottleservice.com>)

The Bank Bottle Service
(<http://thebankbottleservice.cc>)

Story Bottle Service
(<http://storybottleservice.com>)

LIV Bottle Service
(<http://livbottleservice.com>)

Adore Bottle Service
(<http://Adorebottleservice.com>)

All Star Weekend New York

Hakkasan Bottle Service
(<http://hakkasanbottleservice.com>)

is a website launched to cater to the VIP's only crowd visiting Las Vegas, NV. VIP Tables and Buying Bottles at Hakkasan Nightclub in Las Vegas!

Hakkasan NIGHTCLUB
VIP
(<http://Hakkasanbottleservice.com>)

We can get you VIP table at Hakkasan Nightclub.

Simply go to our VIP Bottle Service page for Hakkasan Bottle Service!

[HOME \(/\)](http://Allstarweekendnewyork)

<http://Allstarweekendnewyork>

LETTER

SUBMIT

[GENERAL ADMISSION TIX](#)

[EDC Orlando](#)

<http://edcorlando.com>

<HTTP://VIPTABLRESERVATIONSMIAMI.WANTICKETS.COM/VENUES/8128/HAKKASAN-LAS-VEGAS/?AFFCODE=DC4519E3F88B4990A86D>

[Miami VIP Host](#)

<http://miamiviphost.com>

[NEWS \(/NOTES\)](#)

[CONTACT / RESERVE VIP \(HTTP://VIPTABLRESERVATIONS.COM/LAS-VEGAS/HAKKASAN/BOTTLE-SERVICE-RESERVATIONS\)](#)

[Hakkasan Bottle Service](#)

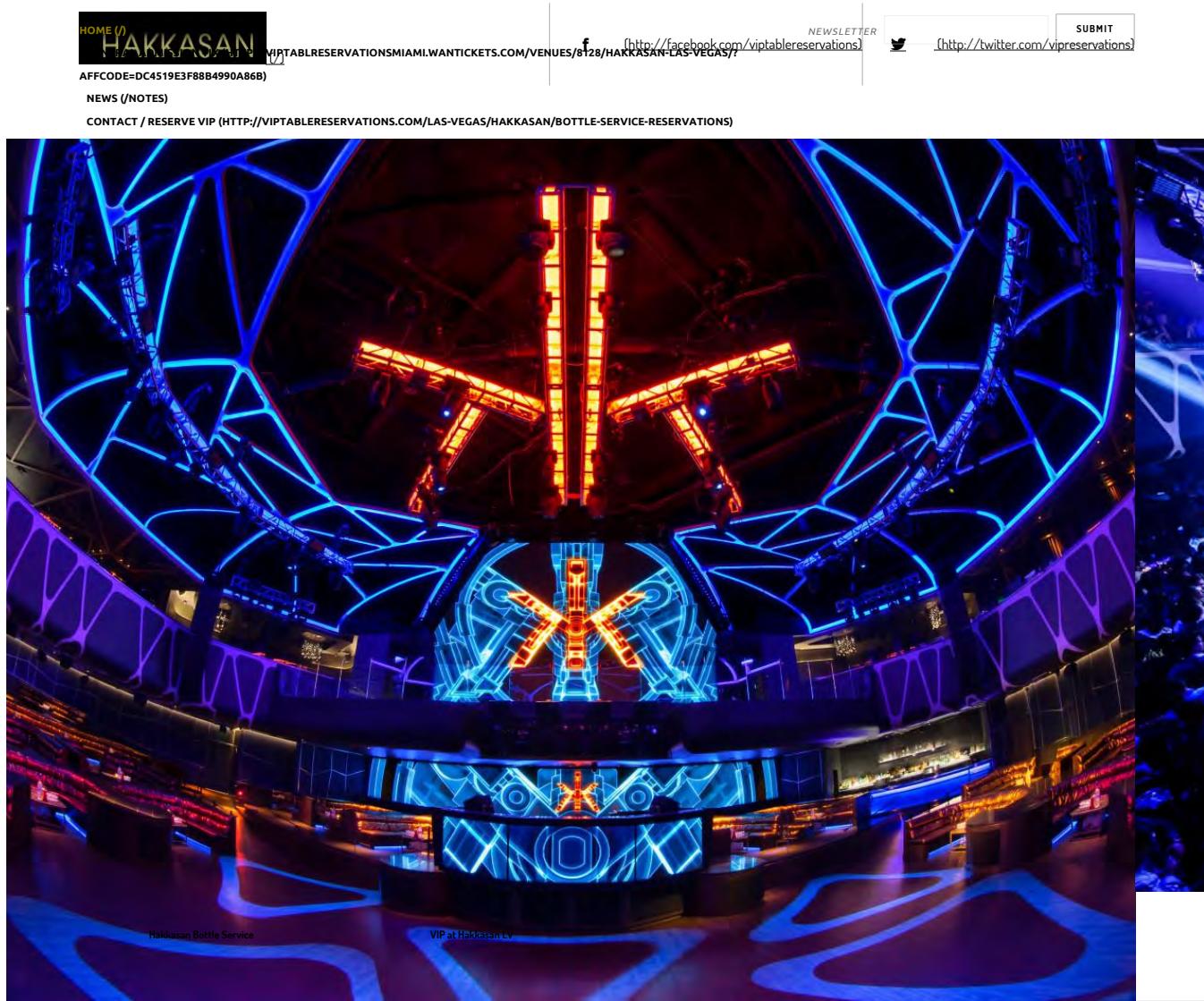
<http://mydigitaladvertising.com>

<http://Hakkasanbottleservice.com> © 2014. All Rights

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Exhibit 5



No Table - No Fun - Book Bottle Service / VIP Table Reservations at Hakkasan Nightclub.

[BOOK VIP TABLE NOW](#)

[\(<http://viptablereservations.com/Las-Vegas/Hakkasan/bottle-service-reservations>\)](http://viptablereservations.com/Las-Vegas/Hakkasan/bottle-service-reservations)



BOOK ONLINE

[Click here to request more information on Hakkasan Bottle Service!](#)
[\(<http://viptablereservations.com/Las-Vegas/Hakkasan/bottle-service-reservations>\)](http://viptablereservations.com/Las-Vegas/Hakkasan/bottle-service-reservations)



ONLINE CONFIRMATION

Get confirmation and information online about your upcoming VIP Table Reservation for Hakkasan Bottle Service (<http://viptablereservations.com/Las-Vegas/Hakkasan/bottle-service-reservations>).



Hakkasan at the MGM Grand

Check out www.MGMGrand.com for Hotel/Casino in Las Vegas..



PHOTOS

Check out the latest photos from Hakkasan in Las Vegas.



Hakkasan MUSIC

Coming Soon!



Hakkasan SOCIAL

[Hakkasan Bottle Service on Facebook](#)
(<http://facebook.com/HakkasanBottleservice>) |
[Hakkasan on Twitter](#)
(<http://twitter.com/Hakkasanvip>)

[HOME \(/\)](#)

[GENERAL ADMISSION TIX \(HTTP://VIPTABLESERVATIONSMIAMI.WANTICKETS.COM/VENUES/8128/HAKKASAN-LAS-VEGAS/?AFFCODE=DC4519E3F88B4990A86B\)](#)
[NEWS \(/NOTES\)](#)
[CONTACT / RESERVE VIP \(HTTP://VIPTABLESERVATIONS.COM/LAS-VEGAS/HAKKASAN/BOTTLE-SERVICE-RESERVATIONS\)](#)

[Hakkasan Bottle Service \(<http://hakkasanbottleservice.com>\)](#)

Hakkasan Bottle Service & VIP Table Reservations.

[Light bottle Service \(<http://lightbottleservice.com>\)](#)

[XS Bottle Service \(<http://xsbottleservice.com>\)](#)

[Hakkasan Bottle Service \(<http://hakkasanbottleservice.com>\)](#)

[The Bank Bottle Service \(<http://thebankbottleservice.com>\)](#)

[Story Bottle Service \(<http://storybottleservice.com>\)](#)

[LIV Bottle Service \(<http://livbottleservice.com>\)](#)

[Adore Bottle Service \(<http://Adorebottleservice.com>\)](#)

[All Star Weekend New York \(<http://Allstarweekendnewyork.com>\)](#)

[EDC Orlando \(<http://edcorlando.com>\)](#)

[Miami VIP Host \(<http://miamiviphost.com>\)](#)

[Hakkasan Bottle Service](#)

[\(<http://hakkasanbottleservice.com>\)](#) is a website launched to cater to the VIP's only crowd visiting Las Vegas, NV. VIP Tables and Buying Bottles at Hakkasan Nightclub in Las Vegas!

[Hakkasan NIGHTCLUB VIP \(<http://Hakkasanbottleservice.com>\)](#)

We can get you VIP table at Hakkasan Nightclub.

Simply go to our VIP Bottle Service page for Hakkasan Bottle Service!

[Hakkasan Bottle Service \(<http://Hakkasanbottleservice.com>\)](#) © 2014. All Rights Reserved. For Promo Use Only! [\(<http://mydigitaladvertising.com>\)](http://mydigitaladvertising.com)





No Table - No Fun - Book Bottle Service / VIP Table Reservations at Hakkasan
Nightclub.

[BOOK VIP TABLE NOW](#)

<http://viptablereservations.com/Las-Vegas/Hakkasan/bottle-service-reservations>



BOOK ONLINE

[Click here to request more information on Hakkasan Bottle Service](http://viptablereservations.com/Las-Vegas/Hakkasan/bottle-service-reservations)



ONLINE CONFIRMATION

Get confirmation and information online about your upcoming VIP Table Reservation For Hakkasan Bottle Service (<http://viptablereservations.com/Las-Vegas/Hakkasan/bottle-service-reservations>).



Hakkasan at the MGM Grand

[Check out www.MGMGrand.com](http://www.MGMGrand.com) (<http://www.MGMGrand.com>) for Hotel/Casino in Las Vegas..



PHOTOS

Check out the latest photos from Hakkasan in Las Vegas.



Hakkasan MUSIC

Coming Soon!



Hakkasan SOCIAL

[Hakkasan Bottle Service on Facebook](http://facebook.com/HakkasanBottleservice) (<http://facebook.com/HakkasanBottleservice>) |
[Hakkasan on Twitter](http://twitter.com/Hakkasanvip) (<http://twitter.com/Hakkasanvip>)

[HOME \(/\)](#)

GENERAL ADMISSION TIX ([HTTP://VIPTABLESERVATIONSMIAMI.WANTICKETS.COM/VENUES/8128/HAKKASAN-LAS-VEGAS/?AFFCODE=DC4519E3F88B4990A86B](http://VIPTABLESERVATIONSMIAMI.WANTICKETS.COM/VENUES/8128/HAKKASAN-LAS-VEGAS/?AFFCODE=DC4519E3F88B4990A86B))

[NEWS \(/NOTES\)](#)
[Hakkasan Bottle Service \(<http://hakkasanbottleservice.com>\)](#)

[CONTACT / RESERVE VIP \(\[HTTP://VIPTABLESERVATIONSMIAMI.WANTICKETS.COM/VENUES/8128/HAKKASAN-LAS-VEGAS/HAKKASAN-BOTTLE-SERVICE-RESERVATIONS\]\(http://VIPTABLESERVATIONSMIAMI.WANTICKETS.COM/VENUES/8128/HAKKASAN-LAS-VEGAS/HAKKASAN-BOTTLE-SERVICE-RESERVATIONS\)\)](#)

Hakkasan Bottle Service & VIP Table Reservations.

[Light bottle Service \(<http://lightbottleservice.com>\)](#)

[XS Bottle Service \(<http://xsbottleservice.com>\)](#)

[Hakkasan Bottle Service \(<http://hakkasanbottleservice.com>\)](#)

[The Bank Bottle Service \(<http://thebankbottleservice.com>\)](#)

[Story Bottle Service \(<http://storybottleservice.com>\)](#)

[LIV Bottle Service \(<http://livbottleservice.com>\)](#)

[Adore Bottle Service \(<http://Adorebottleservice.com>\)](#)

[All Star Weekend New York \(<http://Allstarweekendnewyork.com>\)](#)

[EDC Orlando \(<http://edcorlando.com>\)](#)

[Miami VIP Host \(<http://miamiviphost.com>\)](#)

NEWSLETTER

SUBMIT

[Hakkasan NIGHTCLUB VIP \(<http://Hakkasanbottleservice.com>\)](#)

We can get you VIP table at Hakkasan Nightclub.

Simply go to our VIP Bottle Service page for Hakkasan Bottle Service!

[Hakkasan Bottle Service \(<http://Hakkasanbottleservice.com>\)](#) © 2014. All Rights Reserved. For Promo Use Only!

[\(http://mydigitaladvertising.com\)](http://mydigitaladvertising.com)



EXHIBIT 6



Lauri S. Thompson
Tel 702.792.3773
Fax 702.792.9002
thompsonl@gtlaw.com

October 3, 2014

**VIA CERTIFIED MAIL &
ELECTRONIC MAIL**

Mark Daniel Adamczyk
iDrive Orlando LLC
P.O. Box 618690
Orlando, FL 32779
Email: info@mydomainholdings.com

**Re: Your Unauthorized Use and Registration of the Internet Domain Names
<hakkasan.net> and <hakkasanbottleservice.com>
Our Ref. 145472.018500**

Dear Mr. Adamczyk:

This firm represents Hakkasan Limited (“Hakkasan”) in connection with various intellectual property matters. Hakkasan owns the exclusive right to use the HAKKASAN name and trademark in connection with, among other things, nightclubs, nightclub services, restaurant services, and bar and cocktail lounge services (the “HAKKASAN Mark”). In particular, Hakkasan owns several United States trademark registrations (US Reg. Nos. 4,458,604 and 3,789,248) and pending applications (US Ser. Nos. 86/183,960, 86/183,953 and 86/183,947) for the HAKKASAN Mark.

Since opening the original HAKKASAN in 2001 and its first United States location in 2009, Hakkasan has continuously and extensively used the HAKKASAN Mark to advertise and promote its properties in the United States and around the world, including its property located in Las Vegas, Nevada. HAKKASAN is one of the most well-known and respected names in the restaurant and nightclub industry. Hakkasan has spent millions of dollars advertising and promoting the HAKKASAN Mark in print, broadcast media and on the Internet through its websites located at <hakkasan.com> and <hakkasanlv.com>. In addition, Hakkasan has made extensive use of the HAKKASAN Mark on, among other things, signage and promotional materials. The result of these efforts is that the HAKKASAN Mark has become distinctive and famous for nightclub, restaurant and bar services. Thus, it is imperative to Hakkasan that its HAKKASAN Mark is protected to the fullest extent permitted by law and that the public is not deceived as to the affiliation between its business activities and your own.

On or about January 27, 2013, you registered the Internet domain name <hakkasan.net> and on March 7, 2013, you registered the domain name

Mark Daniel Adamczyk

October 3, 2014

Page 2

<hakkasanbottleservice.com> (the “Infringing Domain Names”). The Infringing Domain Names both link to a website that claims to provide VIP table reservations and bottle service as well as general admission tickets to our client’s Hakkasan nightclub in Las Vegas, Nevada. Further, your website invites users to submit their personal information to obtain bottle service at Hakkasan. The website also contains the HAKKASAN trademark and other intellectual property owned by Hakkasan. These activities imply an affiliation and/or endorsement by the actual Hakkasan nightclub. However, your activities are not authorized by Hakkasan, have infringed Hakkasan’s intellectual property rights, and must cease immediately.

Specifically, your registration and use of the Infringing Domain Names violates the Anti-cybersquatting Consumer Protection Act (the “ACPA”), 15 U.S.C. § 1125(d), which Congress passed into law in 1999. Congress’ stated purpose for that law was to prevent cybersquatting by “prohibiting the bad faith and abusive registration of distinctive marks as Internet domain names with the intent to profit from the goodwill associated with such marks.” To assert a successful cybersquatting claim against you, Hakkasan must demonstrate: (1) the HAKKASAN name is distinctive and protected as a mark; (2) the Infringing Domain Names are identical and/or confusingly similar to that mark; and (3) you possess the bad faith intent to profit from registration of the domain names. *See* 15 U.S.C. § 1125(d).

Hakkasan can easily demonstrate each of these elements. First, as discussed, Hakkasan is among the most well-known restaurant and nightclub operators in the world. Consumers in the United States and throughout the world associate Hakkasan and the HAKKASAN Mark with the highest quality restaurant and nightclub services.

Second, the Infringing Domain Names contain the entirety of our client’s HAKKASAN Mark, accompanied by the terms “bottle service,” which are some of the very same services provided inside the Hakkasan nightclub. Finally, we can show that you possess a bad faith intent to profit from the registration of the Infringing Domain Names. By connecting the domain names to your website where you claim to provide VIP table reservations to Hakkasan, you are attempting to create the impression that your services are affiliated with or endorsed by Hakkasan when they are not. Thus, it is clear that you wrongfully registered the Infringing Domain Names with the intent to profit from the reputation and goodwill vested in Hakkasan.

The ACPA provides that plaintiffs, such as Hakkasan, may collect up to \$100,000 in damages (per domain name) from cybersquatters. You illegally registered the Infringing Domain Names with the bad faith intent to profit from those registrations. As such, if Hakkasan is compelled to file suit against you, it will request that the Court levy the maximum amount of damages. It would also request reimbursement of all attorney’s fees and costs expended to recover the Infringing Domain Names.

Mark Daniel Adamczyk

October 3, 2014

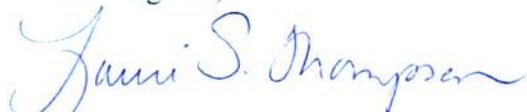
Page 3

Hakkasan possesses several other claims against you for your unlawful and unauthorized use of the HAKKASAN Mark, including but not limited to, claims for trademark infringement and unfair competition under the federal Lanham Act, which could subject you to significantly more damages should Hakkasan be forced to file suit against you. Our client, however, would prefer to resolve this matter amicably and without court action, if such a resolution can be reached expeditiously. As such, Hakkasan will refrain from immediately filing suit if you respond to this communication by no later than **Monday, October 13, 2014**, to discuss potential settlement options, which will include transferring the Infringing Domain Names to Hakkasan.

Please note that any attempt to sell, transfer, or dispose of the Infringing Domain Names in any manner without the express consent of Hakkasan is prohibited. Any transfer, disposition, or alteration of the registration information for the Infringing Domain Names without Hakkasan's approval and consent, throughout the pendency of this dispute, is unlawful and will subject you to further damages and liability under the ACPA and other state and federal statutes.

Once again, Hakkasan considers your actions to be very serious. Failure to respond in a timely fashion will force our client to explore options that will include judicial intervention. Thank you in advance for your anticipated cooperation. Please feel free to contact me with any questions.

Best regards,



Lauri S. Thompson

Exhibit 7

Ney, Cynthia (Para-LV-LT)

From: info@mydomainholdings.com
Sent: Friday, October 03, 2014 5:04 PM
To: 'delacruz@gtlaw.com'
Cc: Thompson, Lauri S. (Shld-LV-IP-Tech); Norton, Shauna (Assoc-LV-IP-Tech)
Subject: RE: Registered: Unauthorized Use and Registration of Internet Domain Names

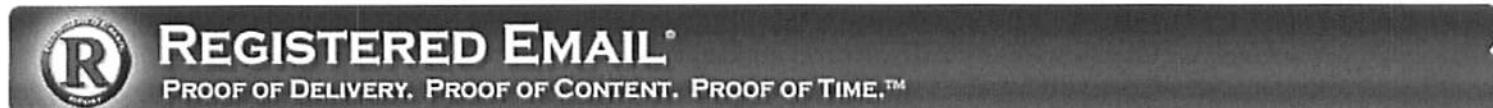
Hello,

These domains were not setup in bad faith. In fact, Hakkasan makes money by having Vegas VIP hosts promote the nightclub and pays these VIP hosts a commission. This website is setup to get people to book through a Vegas VIP Host. If a Judge states a company such as - <http://www.vegasbottle.com/hakkasan-las-vegas> can make pages instead of just making a landing page domain I would have to hear from that. However, I would be willing to settle this dispute and sell the domains to you. I currently get \$399/mo from a Vegas VIP host for the leads. We have a one year agreement. I would sell at that price to avoid costly litigation process. So, \$4,788 and you can have them both and the websites that exist. The website alone cost 2k to make – not to mention the on-going search engine optimization charges that I do for it. Let me know.

Thanks,

Mark
407-777-8777

From: delacruz@gtlaw.com [mailto:delacruz@gtlaw.com]
Sent: Friday, October 3, 2014 4:50 PM
To: info@mydomainholdings.com
Cc: ThompsonL@gtlaw.com; nortons@gtlaw.com
Subject: Registered: Unauthorized Use and Registration of Internet Domain Names



This is a Registered Email® message from delacruz@gtlaw.com.
Your reply will be returned as a Registered Email® message.

Dear Mr. Adamczyk:

Attached please find correspondence from Lauri Thompson.

Should you have any questions, please do not hesitate to contact our office.

Thank you.

Carmela de la Cruz
IP Assistant
Greenberg Traurig, LLP | Suite 400 North
3773 Howard Hughes Parkway | Las Vegas, Nevada 89169
Direct: 702.938.6924

delacruze@gtlaw.com | www.gtlaw.com



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[Click here](#) to reply with a Registered Email® message.

Powered by RPost®

Exhibit 8

Ney, Cynthia (Para-LV-LT)

From: info@mydomainholdings.com
Sent: Monday, October 06, 2014 10:21 AM
To: Norton, Shauna (Assoc-LV-IP-Tech)
Cc: Thompson, Lauri S. (Shld-LV-IP-Tech); De la Cruz, Carmela (Secy-LV-IP-Tech)
Subject: RE: Registered: Unauthorized Use and Registration of Internet Domain Names

Importance: High

Hey Shauna,

I appreciate the email and stuff. However, going to have to decline. Hakkasan is a company that pays a commission to outside VIP hosts in Vegas when they book VIP tables. This is just a website setup for that and leads are sent to commissioned VIP hosts. Same as other websites doing this and promoting Hakkasan on social media. I would have to hear from a Judge directly that this is a violation. I would appeal a decision I don't agree with anyway. Like I said, I have VIP hosts that get the leads. The search engine optimization and the website setup cost me time and money. I will not be just giving these domains away without some sort of compensation. Ball is in your court. If you want to avoid hefty legal fees and time preparing stuff make me an offer. If not, I guess I will see you in court.

Govern Yourself Accordingly,

Mark
407-777-8777

From: nortons@gtlaw.com [mailto:nortons@gtlaw.com]
Sent: Monday, October 6, 2014 12:45 PM
To: info@mydomainholdings.com
Cc: ThompsonL@gtlaw.com; delacruzc@gtlaw.com
Subject: RE: Registered: Unauthorized Use and Registration of Internet Domain Names

Mark,

Our client will not compensate you for these domain names. Registering domain names that contain others' trademarks, then offering to sell the domains to the trademark owner is a form of cybersquatting and has been held to demonstrate bad faith in such actions. As stated in our letter, the Anti-Cybersquatting Consumer Protection Act allows for statutory damages of up to \$100,000 per infringing domain name, plus attorney's fees and costs to be awarded to the trademark owner.

You should know that our client takes cybersquatting very seriously. Please be advised that we are authorized to commence litigation regarding these domain names. If we are forced to file a lawsuit, our client will seek the maximum amount of damages and attorney's fees and costs. However, our client would be willing to resolve this matter without further action if you agree to immediately transfer these domain names. Please let us know if you are willing to do so no later than close of business today. Thank you,

Shauna

Shauna Norton
Associate
Greenberg Traurig, LLP | Suite 400 North
3773 Howard Hughes Parkway | Las Vegas, Nevada 89169
Tel 702.599.8011 | Fax 702.792.9002